

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JASON WALTERS,

Plaintiff,

v.

EXCEL, INC. d/b/a DHL SUPPLY CHAIN,

Defendant.

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CIVIL ACTION NO. 3:22-cv-01840-C

**DEFENDANT’S UNOPPOSED MOTION TO
EXTEND EXPERT DESIGNATION DEADLINE**

COMES NOW Defendant Exel Inc. (“**Defendant**”) and submits this Unopposed Motion to Extend Expert Designation Deadline and, in support thereof, would respectfully show the Court as follows:

1. The Court entered a Second Amended Scheduling Order [Doc. # 41] on June 14, 2023, *inter alia* requiring the parties to each file a written designation of their testifying experts and otherwise comply with Fed. R. Civ. P. 26(a)(2) on or before October 27, 2023.

2. Defendant filed an Unopposed Motion to Extend that deadline to November 27, 2023 [Doc. #48], which the Court granted on October 30, 2023 [Doc. #49].

3. Defendant requests a brief, two-day extension of the parties’ mutual deadline to disclose experts, making the designations due on or before November 29, 2023.

4. The requested extension does not affect any other deadlines in this matter or the trial date.

5. Defendant makes this request not for purposes of delay but so that justice may be done.

Respectfully Submitted,

/s/ Theanna Bezney

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COUNSEL FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I hereby certify that on November 21, 2023, I conferred with Bob Whitehurst, attorney for Plaintiff, who stated that Plaintiff does not oppose the relief requested herein.

/s/ Theanna Bezney

Theanna Bezney

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2023, I filed the foregoing document with the Court's electronic case filing system, which shall send notice of the foregoing filing to all counsel of record, as follows:

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/s/ Theanna Bezney

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